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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION / PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

This Document Relates To:

All Actions

Case No.: 4:22-md-03047-YGR

MDL No. 3047

**JOINT NOTICE OF PLAINTIFFS'  
MOTION TO MODIFY THE  
PROTECTIVE ORDER**

1 On May 22, 2023, the Honorable Thomas S. Hixson entered a Protective Order for this  
2 litigation. ECF No. 290. On June 5, 2023, Plaintiffs moved the Honorable Yvonne Gonzalez  
3 Rogers for relief from Section 7.6 of the Protective Order, which requires the Parties to disclose  
4 the identity of, and other information about, their experts and obtain permission from the  
5 producing Party before showing such experts documents that Party designated highly  
6 confidential. ECF No. 303. At the November 16 Case Management Conference, Judge Gonzalez  
7 Rogers directed the Parties to address this motion in the first instance to the Honorable Peter H.  
8 Kang, to whom all discovery in this matter is now referred. At the December 14 Discovery  
9 Conference, Judge Kang instructed Plaintiffs to withdraw their motion for relief from Section 7.6  
10 of the Protective Order and to refile the relevant documentation as a Motion to Modify the  
11 Protective Order. ECF No. 484.

12 In accordance with Judge Kang's instructions, the Parties hereby attach the following  
13 previously filed documents:

- **Exhibit 1:** Plaintiffs' Motion for Relief from Nondispositive Pretrial Order of Magistrate Judge Regarding Expert Disclosure and attached exhibits (ECF No. 303)
- **Exhibit 2:** Defendants Meta, TikTok, and YouTube's Response to Plaintiffs' Motion for Relief from Nondispositive Pretrial Order of Magistrate Judge Regarding Expert Disclosure (ECF No. 318)
- **Exhibit 3:** Plaintiffs' Reply in Support of Motion for Relief from Nondispositive Pretrial Order of Magistrate Judge Regarding Expert Disclosure (ECF No. 321)
- **Exhibit 4:** State Plaintiffs' Position Statement Regarding Protective Order and ESI Protocol (ECF No. 478)

22 | Dated: December 18, 2023

Respectfully submitted,

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## **ATTESTATION**

I hereby attest pursuant to N.D. Cal. Civil L.R. 5-1 that the concurrence to filing of this document has been obtained from each signatory hereto.

DATED: December 18, 2023

By: /s/ Lexi J. Hazam  
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